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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JULIETA G. LUDOVICO,

Plaintiff,

v.

KAISER PERMANENTE aka THE
PERMANENTE MEDICAL GROUP, INC., a
California corporation, and DOES 1-20,
inclusive,

Defendant.

Case No. CASE NO. C12-4363 EMC

**STIPULATION FOR ORDER AND
[PROPOSED] ORDER TO EXTEND EXPERT
DISCLOSURE AND EXPERT DISCOVERY
CASE MANAGEMENT DEADLINES**

/ TRIAL DATE: October 6, 2014

Plaintiff JULIETA LUDOVICO, through her counsel, Sheila A. Reid, Esq., of John F. Prentice & Associates, PC, and Defendant KAISER PERMANENTE aka THE PERMANENTE MEDICAL GROUP, INC., through its counsel, Kathleen M. Hurly, Esq., of Kaufman Dolowich Voluck, LLP, stipulate as follows:

1. The parties wish to extend the expert disclosure deadline and the expert discovery deadline in this matter. The current deadline for expert disclosures is April 29, 2014. The parties make this stipulation to disclose and depose experts after the last day upon which a motion for summary judgment can be heard which is no later than July 10, 2014.

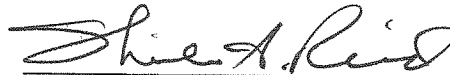
**STIPULATION AND ORDER TO EXTEND EXPERT DISCLOSURE AND EXPERT DISCOVERY CASE
MANAGEMENT DEADLINES**

1 2. The parties respectfully request that the Court set July 24, 2014, as the expert disclosure
2 deadline; August 7, 2014, as the rebuttal expert disclosure deadline; and August 21, 2014, as the expert
3 discovery cutoff. This proposed schedule will not affect other case management and pretrial deadlines.

4 IT IS SO STIPULATED.

5 DATED: April ³/₂, 2014

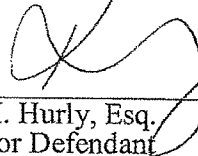
JOHN F. PRENTICE & ASSOCIATES, P.C.



John F. Prentice, Esq.
Sheila A. Reid, Esq.
Attorneys for Plaintiff
Julieta G. Ludovico

10 DATED: April ³/₂, 2014

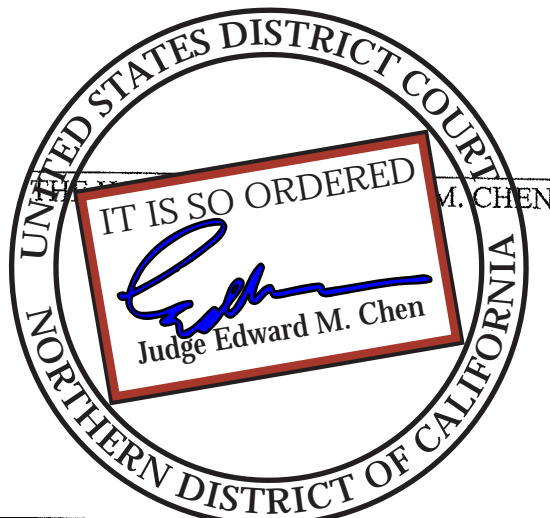
KAUFMAN DOLOWICH VOLUCK, LLP



Kathleen M. Hurly, Esq.
Attorneys for Defendant
Kaiser Permanente aka The Permanente Medical Group

ORDER

IT IS SO ORDERED.



STIPULATION AND ORDER TO EXTEND EXPERT DISCLOSURE AND EXPERT DISCOVERY CASE
MANAGEMENT DEADLINES